



August 11, 2022

VIA ELECTRONIC COURT FILING

The Honorable Philip M. Halpern  
Federal Building and Courthouse  
300 Quarropas Street, Room 520  
White Plains, New York 10601

The request for a stay of the Court's August 4, 2022 Order (Doc. 53) through September 9, 2022 is granted. The Court does not, however, endorse counsel's conclusions herein as to the timeframe for motion practice set forth in the Federal Rules of Civil Procedure and the Local Civil Rules.

The Clerk of Court is respectfully directed to terminate the motion sequence pending at Doc. 54.

SO ORDERED.

Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
August 12, 2022

Re: *Doe v. Juan Gonzales Agency Corporation et al.*, No. 7:21-cv-00610 (S.D.N.Y.)

Dear Judge Halpern:

We represent the Plaintiff in the above referenced action. I write in response to the order entered into the docket of this case last Thursday, Aug. 4, 2022 (Dkt. #53 hereinafter referred to as "the Order"), to inform the Court that Plaintiff intends to make an application, by filing a pre-motion letter in accordance with Your Honor's Individual Civil Rule C., for relief from the Order pursuant to FRCP 59 and 60, as well as Local Civil Rule 6.3, in the form of a motion for reconsideration and re-argument. Accordingly, Plaintiff respectfully requests a continuation of the stay in the Order for a minimum of an additional 28 days that reflects the 28-day period to file such a motion provided by FRCP 59(e).

All Defendants consent to the requested continuation of the stay, and this is the first such request.

Plaintiff thanks the Court for its consideration of this matter.

Dated: New York, New York  
August 11, 2022

*Respectfully submitted,*

DEREK SMITH LAW GROUP, PLLC  
*Attorneys for Claimant*

Seamus P. Barrett, Esq.

CC: to all parties via ECF